

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ROYAL INDEMNITY COMPANY,

Plaintiff,

V.

C.A. No. 05-165-JJF

PEPPER HAMILTON LLP, W. RODERICK
GAGNE', FREED MAXICK & BATTAGLIA
CPAs, McGLADREY & PULLEN LLP, and
MICHAEL AQUINO,

Defendants.

CHARLES A. STANZIALE, JR.,
Chapter 7 Trustee of Student Finance
Corporation,

Plaintiff,

C.A. No. 05-72-JJF

V.

McGLADREY & PULLEN LLP and
MICHAEL AQUINO,

Defendants.

CHARLES A. STANZIALE, JR.,
Chapter 7 Trustee of Student Finance
Corporation,

Plaintiff,

C.A. No. 04-1551-JJF

V.

PEPPER HAMILTON LLP, et al.,

Defendants.

MBIA INSURANCE CORPORATION and)	
WELLS FARGO BANK, N.A. (f/k/a WELLS)	
FARGO BANK MINNESOTA N.A.) as)	
TRUSTEE OF SFC GRANTOR TRUST,)	
SERIES 2000-1, SFC GRANTOR TRUST,)	
SERIES 2000-2, SFC GRANTOR TRUST,)	
SERIES 2000-3, SFC GRANTOR TRUST,)	C.A. No. 02-1294-JJF
SERIES 2000-4, SFC GRANTOR TRUST,)	
SERIES 2001-1, SFC GRANTOR TRUST,)	
SERIES 2001-2, SFC OWNER TRUST 2001-I,)	
AND SFC GRANTOR TRUST, SERIES 2001-3,)	
)	
Plaintiffs/Counterclaim Defendants,)	
)	
v.)	
)	
ROYAL INDEMNITY COMPANY,)	
)	
Defendant/Counterclaim Plaintiff.)	
_____)	

PLAINTIFF ROYAL INDEMNITY COMPANY'S MOTION TO COMPEL

For the reasons more fully set forth in the accompanying memorandum, Royal Indemnity Company ("Royal") hereby moves to compel the 30(b)(6) deposition of MBIA Insurance Corporation ("MBIA"), a non-party witness in these actions. In compliance with D. Del. LR 7.1.1, Royal has made a reasonable effort to reach agreement with respect to the subject matter of this motion but was unable to do so.

Dated: May 25, 2007

Respectfully submitted,

ASHBY & GEDDES



Michael H. Barr
Kenneth J. Pfaehler
SONNENSCHN NATH & ROSENTHAL LLP
1221 Avenue of the Americas
New York, New York 10020-1089
(212) 768-6700
(212) 768-6800 (fax)
- and -

Lawrence C. Ashby (#468)
Philip Trainer, Jr. (#2788)
Tiffany L. Geyer (#3950)
Andrew D. Cordo (#4534)
222 Delaware Avenue, 17th Floor
Wilmington, Delaware 19899
(302) 654-1888
(302) 654 2067 (Fax)

*Attorneys for Plaintiff
Royal Indemnity Company*

John Grossbart
Steve Merouse
SONNENSCHN NATH & ROSENTHAL LLP
7800 Sears Tower
233 S. Wacker Drive
Chicago, Illinois 60606
(312) 876-8000
(312) 876-7934 (fax)

180957.1